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July 28, 2021

Honorable Denise L. Cote
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Jingdong Jiang
Docket No.: 1:21 CR 179-01 (DLC); Reg. No.: 8803-054
Sentence Date: June 22, 2021; Surrender Date: July 30, 2021

Dear Judge Cote:

As you may recall, I represent Jingdong Jiang with regard to the above-referenced case. On June 22, 2021, your Honor sentenced Mr. Jiang to one year and one day. His surrender date is currently scheduled for Friday, July 30, 2021. Mr. Jiang has been designated by Bureau of Prisons ("BOP") to surrender at Dalby Correctional Institution in Post, Texas.

Mr. Jiang's current designation in Post, Texas would create an extreme hardship for his wife, and others, who would like to visit Mr. Jiang while he is incarcerated. Given the distance and cost of traveling between New York and Texas, Mr. Jiang's wife will likely never be able to visit him in jail. Considering the significant distance between New York and Texas and the extreme hardship that such a distance will cause to the likelihood of Mr. Jiang receiving any visitors, please issue an order, recommending that BOP change its current designation for Mr. Jiang, and instead, change his designation to a facility in the greater New York metro area.

Thank you for your attention herein. Please contact me if you have any questions or need any additional information.

Denise L. Cote
Denise Cote
7/30/21

Very truly yours,

LAZZARO LAW FIRM, P.C.

BY: 
LANCE LAZZARO

cc.: AUSA Elizabeth Espinosa, via e-mail: elizabeth.espinosa@usdoj.gov